



October 21, 2019

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notification of Substantive Change, *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Service and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123—47 C.F.R. § 64.606(f)(2).

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 64.606(f)(2), Sorenson Communications, LLC, (“Sorenson”) hereby notifies the Commission of changes to its TRS service. Sorenson notes that it is unclear whether the changes reported herein constitute “substantive changes” warranting notification under section 64.606(f)(2), as they are relatively minor updates that do not affect Sorenson’s compliance with the Commission’s mandatory minimum standards.¹ Out of an abundance of caution, Sorenson is providing this information to ensure that the Commission has up-to-date information about Sorenson’s technologies.

On or around August 22, 2019, Sorenson adopted new technologies that will improve service for its users. The changes include:

- Display of the customer’s videophone (“VP”) number on the in-call options screen and other places in the user interface (“UI”);
- The addition of a “NEW!” tag next to displays of the customer’s VP number in the UI, for the first 30 days after the customer has a new VP number; and
- The addition of a feature for customers to share their VP number with the other party while on a call.

On or around the same date, Sorenson also added new or enhanced existing features to Sorenson’s ntouch Mobile and ntouch Desktop applications. The changes include:

¹ See *Structure and Practices of the Video Relay Service Program*, Second Report and Order and Order, FCC No. 11-118, CG Docket No 10-51, 26 FCC Rcd. 10898, 10917–18 ¶¶ 45–48 (2011).

**For Desktop and iOS Platforms**

- A new feature where customers can provide interpreter feedback on Sorenson Video Relay Service calls by locating the interpreter ID in their Call History list or Call Details screen;
- A new capability for customers to copy received text from the Shared Text feature for pasting; and
- A new feature that sends a notification to customers who attempt to enter a P.O. Box address on the 911 Location Info screen that (1) they cannot use a P.O. Box as a 911 location and (2) provides another opportunity to enter a non-P.O. Box address.

For the iOS Application Only

- A new UI for customers that use iOS devices running iOS 10 and later. The new UI design incorporates the iOS 12 human interface guidelines and adds a self-view feature where users can check their appearance before placing a call.

For Desktop Platforms Only

- “Customer Service” replaces “Customer Information Representative” or “CIR” terminology in the dialogs and screens that reference the Sorenson Customer Service department.

Sorenson certifies that these changes do not affect its compliance with applicable minimum standards.

Sincerely,

A handwritten signature in blue ink that reads "Steven Fredley".

Steven Fredley
Deputy General Counsel